

# **EXHIBIT I**

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)  ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN)  ECF Case

**DECLARATION OF STEPHEN J. KING, III**

I, Stephen J. King, III, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below.

The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at the first tower when the terrorist attacks of the World Trade Center Towers occurred.

4. On September 11, 2001 I was employed and working as a Battalion Chief of the New York City Fire Department.

5. I was in New York at Ground Zero shortly after the first plane hit the first tower and before the second plane struck the second tower and I received physical injuries in the escape and collapse. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone.

Although I had been a firefighter for many years by the day of the attack, when we were brutally attacked by terrorists my life was altered forever. I had never seen nor could I have imagined anything like it.

6. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: shattered meniscus in knee; ongoing muscular knee problems; hearing loss and tinnitus; lung scarring and nodules; Barrett's esophagus; Post Traumatic Stress Disorder ("PTSD"); and various GI-related issues. As a result of my injuries, my last day of work as a firefighter was 9/11/2001.
7. The various sights, sounds, and traumas I witnessed on 9/11 led to PTSD I have suffered from ever since. I drove to work on the morning of September 11th much like I did any day. Shortly after I arrived, I witnessed the North Tower explode. Before they officially called for first responders, I turned to my aide Bobby Crawford and told him "let's get going." When we arrived well before the second plane hit, I saw bodies falling from the towers and I heard those same bodies falling around the car my driver Bobby and I were riding in. We were forced to seek shelter from falling bodies and debris. I saw one body hit and kill a fellow firefighter. Bobby and I ran into the tower to help evacuate civilians, but I lost Bobby in the chaos and I later found out he died in the attack. I lost over half of my battalion of firefighters I was responsible for as their chief. I served at the command post and would not leave those firefighters working the stairwells behind. I remember one of them shaking my hand for the last time before he left to help assist civilians in escaping. I got a radio transmission that the tower was coming down. I know now that was in reference to the South Tower, but at the time it felt and sounded like the North Tower—the one I was in—was coming down. They say it took ten or eleven seconds for the South

Tower to come down completely. Yet I distinctly remember seeing before my eyes my complete life unfolding. Everything from my childhood, my school days, time in the Navy, raising our children, my entire life. Suddenly the noise stopped and I realized I was still alive. I was covered in debris and engulfed in smoke and heavy dust unable to see or barely breathe. Somehow I had shattered my left knee. Through the confusion, I was able to get out of the tower just before it collapsed behind me. I threw myself down a subway staircase to survive. I was covered by debris which came tumbling down the stairs. I lost consciousness and the next thing I remember was a doctor wearing a white uniform.

8. The effects of PTSD are still with me to this day. Despite 30 years working as a firefighter, I know longer was able to even stand next to a high rise building and I dreaded going over bridges. I was not able to sleep without nightmares. I have tried many treatments including sleeping pills, anxiety medications, therapy, and virtual reality. While they have helped, the experience will never leave me.
9. I sought and continue to seek medical attention for my injuries.
10. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.
11. I previously pursued a claim through the September 11<sup>th</sup> Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 8th day of January 2020

Stephen J. King III  
Signature of Declarant

Susan M. Fisher 01/08/2020

**SUSAN M. FISHER**  
Notary Public, State of New York  
Reg. #01FI5041502  
Qualified in Ulster County  
Commission Expires April 3, 2023.

() for Stephen J. King III ()

# **Exhibits Filed Under Seal**